

REPORT HIGHLIGHTS



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Many Independent Organ Procurement Organizations Did Not Meet Medicare Requirements for Reporting Kidney Transportation Costs and Some Did Not Transport Organs in Accordance With Medicare Requirements

Why OIG Did This Audit

- Organ Procurement Organizations (OPOs) are not-for-profit organizations that perform or coordinate the procurement and preservation of organs, such as kidneys, as well as transportation of organs.
- Our preliminary analysis of independent OPOs' Medicare cost reports showed that average direct transportation costs per kidney varied considerably among these OPOs, which raised concerns that some independent OPOs may have been incorrectly allocating transportation costs. In addition, we identified concerns about ineffective transportation practices that resulted in the loss of or damage to organs.
- This audit assessed whether independent OPOs: (1) reported kidney transportation costs that met Medicare requirements and (2) transported organs in accordance with Medicare requirements.

What OIG Found

Not all of 43 selected independent OPOs reported (on their FY 2023 Medicare cost reports) kidney transportation costs that met Medicare requirements or transported organs in accordance with Medicare requirements.

- Twenty-one OPOs reported kidney transportation costs, totaling \$188,147, that did not meet Medicare requirements because the costs were either improperly allocated or inadequately supported.
- Twenty-six OPOs reported additional kidney transportation costs, totaling \$240,178, that did not meet Medicare requirements.

In total, the OPOs reported \$428,325 of unallowable kidney transportation costs.

In addition, four OPOs did not meet Medicare requirements for organ preparation and transport.

What OIG Recommends

We made two recommendations to [CMS](#) that it instruct the Medicare administrative contractor to (1) recover \$428,325 in unallowable organ transportation costs by adjusting the applicable OPOs' cost reports and (2) provide additional education to the independent OPOs. The full recommendations are in the report.

CMS concurred with both of our recommendations.